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11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 **CHRISTOPHER A. CARRASCO,**

Petitioner,

15
16 v.

17 **ROBERT A. HOREL, Warden,**

18 Respondent.
19

C 07-5666 MMC (PR)

**DECLARATION OF
COUNSEL IN SUPPORT OF
APPLICATION FOR LEAVE
TO FILE BRIEF IN EXCESS
OF 25 PAGES**

20 I, MICHELE J. SWANSON, declare under penalty of perjury:

21 I am a Deputy Attorney General for the State of California. I prepared the
22 Memorandum of Points and Authorities in Support of the Answer to the Petition for Writ of
23 Habeas Corpus.

24 Petitioner filed a 46-page Petition for Writ of Habeas Corpus. The Court found all
25 four of the claims (with numerous sub-claims) raised in the petition cognizable.

26 I responded to each of petitioner's claims as succinctly as possible in our brief.
27 Several claims required a detailed discussion of the state court proceedings in order to analyze
28 the legal issues in factual context. Also, because petitioner did not specifically address the

1 impact of the Antiterrorism and Effective Death Penalty Act of 1996 (AEDPA) in his petition, it
2 was necessary to set forth the applicable standard of review both generally and as it applied to
3 the specific claims.

4 The state has an obligation to present this Court with all relevant arguments in order to
5 ensure that the final decision does justice to all parties. In order to meet that obligation, I
6 respectfully request leave to file a brief in excess of 25 pages, or 29 pages in all.

7 I declare under penalty of perjury that the foregoing is true and correct.

8 Executed at San Francisco, California, on August 28, 2008.

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10 /s/ Michele J. Swanson
11 MICHELE J. SWANSON
Deputy Attorney General

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